

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

MICHAEL J. QUILLING, Receiver §  
for Megafund Corporation and Stanley A. §  
Leitner, §  
Plaintiff, §

v. §

Civil Action No. 3:06-CV-1088  
ECF

ALLAN CLARK, Individually and §  
d/b/a FINANCIAL RISK SPECIALISTS, §  
Defendant. §

(JURY TRIAL DEMANDED)

**MOTION TO APPROVE AGREED ORDER**  
**EXPANDING DEADLINE FOR DEFENDANT'S ANSWER**

TO THE HONORABLE ED KINKEADE, UNITED STATES DISTRICT COURT JUDGE:

COMES NOW, Michael J. Quilling, as Receiver for Megafund Corporation and Stanley A. Leitner, ("Plaintiff") and requests that this Court issue an Agreed Order expanding the deadline for Defendant's Answer until July 31, 2006, and in support of such would respectfully show unto the Court as follows:

1. The parties are in settlement negotiations and anticipate reaching a final resolution of this matter by July 28, 2006 and wish to avoid the necessity of having to file further pleadings until that time.
2. To accommodate these negotiations, the parties have both consented to entry of an Agreed Order expanding Defendant's answer date to July 31, 2006.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that upon final consideration of this matter that this Court issue an Agreed Order, attached hereto as Exhibit "A", and for such

other and further relief, general or special, at law or in equity, to which he may show himself justly entitled.

Respectfully submitted,

QUILLING SELANDER CUMMISKEY & LOWNDS, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201-4240  
(214) 871-2100 (Telephone)  
(214) 871-2111 (Facsimile)

By: /s/ Brent J. Rodine

Brent J. Rodine  
State Bar No. 24048770  
Email: [brodine@qsclpc.com](mailto:brodine@qsclpc.com)  
Michael J. Quilling  
State Bar No. 16432300  
Email: [mquilling@qsclpc.com](mailto:mquilling@qsclpc.com)

ATTORNEYS FOR RECEIVER

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of July, 2006 a true and correct copy of the above and foregoing motion was served, via first class mail, with full and proper postage prepaid thereon, to:

Allan Clark  
Financial Risk Specialists  
5215 North O'Connor Boulevard, Suite 200  
Irving, Texas 75039

/s/ Brent J. Rodine